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Attorney for Defendant
LINCOLN LIFE ASSURANCE COMPANY
OF BOSTON

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON – SEATTLE DIVISION

SAMANTHA BLAKE

Plaintiff,

v.

U.S. ROCHE HEALTH AND
WELFARE VEBA PLAN; U.S.
ROCHE LONG-TERM DISABILITY
PLAN; and LINCOLN LIFE
ASSURANCE COMPANY OF
BOSTON f/k/a/ LIBERTY LIFE
INSURANCE

Defendants.

Case No. 2:22-cv-00021-RSM

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT AND TO MODIFY THE
DEADLINES SET BY THE COURT’S
SCHEDULING ORDER**

Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Samantha Blake (“Plaintiff”) and Defendant Lincoln Life Assurance Company of Boston (“Lincoln”), by and through their respective counsel, hereby stipulate and request that this Court enter an Order extending the time for Lincoln to respond to Plaintiff’s Complaint and modifying the dates set by this Court’s January 24, 2022 Scheduling Order. The Parties state as follows:

1. On January 7, 2022, Plaintiff filed the instant lawsuit for disability benefits

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1 and attorneys' fees under the Employee Retirement Income Security Act of 1974 against
 2 Defendants U.S. Roche Health and Welfare VEBA Plan, U.S. Roche Long-Term Disability
 3 Plan, and Lincoln.

4 2. The Parties have conferred and agree to extend the time for Lincoln to
 5 respond to Plaintiff's Complaint by thirty (30) days, from the current date of February 8,
 6 2022, to March 10, 2022.

7 3. The Parties have further conferred and agree to extend the deadlines set by
 8 the Court's January 24, 2022 Scheduling Order as follows:

Event	Current Deadline	New Deadline
Rule 26(f) Conference	2/22/2022	3/24/2022
Initial Disclosures	2/28/2022	3/30/2022
Joint Status Report and Discovery Plan	3/07/2022	4/06/2022

14 4. A brief extension would allow Lincoln to more adequately investigate the
 15 allegations of the Complaint and enable the parties to engage in early resolution discussions
 16 and avoid the expenditure of unnecessary legal costs and judicial resources.

17 5. No prior extensions of time have been requested or granted.

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NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

The deadline for Defendant Lincoln Life Assurance Company of Boston to respond to Plaintiff's Complaint shall be extended from February 8, 2022 to March 10, 2022. Further, the deadlines set by the Court's January 24, 2022 Scheduling Order are extended as follows:

Event	Current Deadline	New Deadline
Rule 26(f) Conference	2/22/2022	3/24/2022
Initial Disclosures	2/28/2022	3/30/2022
Joint Status Report and Discovery Plan	3/07/2022	4/06/2022

IT IS SO STIPULATED.

Dated: February 8, 2022

McDOWELL HETHERINGTON LLP

By: /s/ Jodi K. Swick

Jodi K. Swick, WSBA No. 47626

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Attorney for Defendant

LINCOLN LIFE ASSURANCE COMPANY OF
BOSTON

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1 Dated: February 8, 2022

NELSON LANGER ENGLE, PLLC

2
3 By: /s/ Aaron I. Engle

4 Aaron I. Engle, WSBA No. 37955

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6 12055 15th Avenue NE, Suite 100
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8 Attorney for Plaintiff
9 SAMANTHA BLAKE
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ORDER

IT IS HEREBY ORDERED that the Parties' Stipulation is GRANTED, and the Court orders as follows:

1. Defendant Lincoln Life Assurance Company of Boston shall have until March 10, 2022 to Respond to Plaintiff's Complaint.
2. The deadlines set by the Court's January 24, 2022 Scheduling Order are extended as follows:

Event	Current Deadline	New Deadline
Rule 26(f) Conference	2/22/2022	3/24/2022
Initial Disclosures	2/28/2022	3/30/2022
Joint Status Report and Discovery Plan	3/07/2022	4/06/2022

IT IS SO ORDERED.

DATED this 10th day of February, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

1 Presented by:

2 McDOWELL HETHERINGTON LLP

3 

4 By: _____
5 Jodi K. Swick, WSBA No. 47626

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7 14205 SE 36th Street., Suite 100

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9 Attorneys for Defendant

10 LINCOLN LIFE ASSURANCE COMPANY
11 OF BOSTON
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